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6 X ONE X Movie Archive, Inc.,
Central Mills, Inc.(Freeze) and Leo Valencia

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

12 | Fifty-Six Hope Road Music, Ltd. and Zion
Rootswear, LLC.

) Case No. 2:08-cv-00105-PMP-GWF
)
)
) DEFENDANTS A.V.E.L.A., INC.'S
) AND FREEZE'S MOTION TO
) FILE DOCUMENTS UNDER SEAL
) RE: OPPOSITION TO
) PLAINTIFFS' MOTION FOR
) AWARD OF PROFITS AND
) ENHANCED PROFITS

Plaintiffs,

16 A.V.E.L.A., Inc., X ONE X Movie Archive,
17 Inc., Jem Sportswear, Central Mills, Inc.
(Freeze), and Leo Valencia,

Defendants.

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AND RELATED COUNTERCLAIM

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1 Defendants A.V.E.L.A., Inc. ("AVELA") and and Central Mills, Inc. ("Freeze")
2 hereby submit this Motion to File Documents Under Seal and the [Proposed] Order filed
3 concurrently herewith. Defendants respectfully request that the Court accept and
4 maintain, under seal, the following documents:

- 5 (a) Exhibits A, B, C and D to the Declaration of Randi Rosenstein, which
6 consist of documents that show Freeze's total sales and costs for the Marley product; and
7
8 (b) Exhibit C to the declaration of Leo Valencia which includes financial
9 records, and d
10
11 (c) Exhibits A, B, C, D and E to the Declaration of Liza Acuna which consist
12 of documents reflecting AVELA's sales, costs and financial records.
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14 On December 2, 2008 a Protective Order was entered by this Court pursuant to
15 Fed. R. Civ. P. 26 (c). The Protective Order contemplated that there might be
16 confidential information in this case, and that when such information is contained in a
17 document to be filed with the Court, that such filing would be done under seal. In this
18 case, above declarations refer to exhibits that have been designated "Confidential" under
19 the Protective Order (although some were not stamped as such) and are required to be
20 filed under seal. Redacted versions of the declarations were filed electronically on July
21
22 5, 2011.

23 In compliance with the Protective Order, the documents described above should
24 be accepted and maintained by the Court under seal, pursuant to the stipulated Protective
25 Order and pursuant to Fed. R. Civ. P. 26 (c).
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1 DATED: July 5, 2011

THE BALL LAW FIRM, LLP

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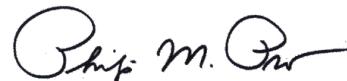
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By: /s/ Douglas D. Winter

DOUGLAS D. WINTER

Attorneys for Defendants A.V.E.L.A.,
Inc. and Freeze

IT IS SO ORDERED.



PHILIP M. PRO
UNITED STATES DISTRICT JUDGE

Dated: April 12, 2012.